

EXHIBIT B

IN THE CIRCUIT COURT OF LOGAN COUNTY, WEST VIRGINIA

REBECCA WORKMAN,

PLAINTIFF,

vs.

CIVIL ACTION NO. 17-C-227-B

WAL-MART STORES EAST, LP

DEFENDANT.

SUMMONS

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby Summoned and required to serve upon STEVEN S. WOLFE, plaintiff's attorney, whose address is P.O. Box 536, Logan, WV 25601 an answer including any related counterclaim you may have to the complaint filed against you in the above civil action, a true copy of which is herewith delivered to you. You are required to serve your answer within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint and you will be thereafter barred from asserting in another action any claim you may have which must be asserted by counterclaim in the above style civil action.

Dated: August 9th, 2017

MARK MCGREW
CLERK OF COURT

BY: M. Copley
DEPUTY CLERK

Please Serve:
CT Corporation System
% Wal-Mart Stores, Inc.
5400 D Big Tyler Road
Charleston, WV 25313

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DEFENDANT.

COMPLAINT

1. Rebecca Workman is a resident of Logan County, West Virginia.
2. Wal-Mart Stores East, LP. is a foreign corporation with its principal office address at 124 West Capital Avenue, Suite 1900, Little Rock, AR 72201. Its notice of process address listed with the West Virginia Secretary of State is CT Corporation System, 5400 D Big Tyler Road, Charleston, WV 25313.
3. At all times relevant to this complaint, Plaintiff was an invitee or guest of the Defendant.
4. At all times relevant herein, the Defendant owed Plaintiff, an invitee or guest, and the general public, a duty to maintain their premise in a safe condition suitable for its intended use.
5. The Defendant negligently maintained an aisle inside its Superstore location in Logan County, West Virginia, by allowing water to accumulate on the floor, which caused Rebecca Workman to slip and fall on July 6, 2017, injuring herself.
6. As a result of the Defendant's negligence, Rebecca Workman has occurred medical expenses, suffered mental anguish, and endured pain and suffering. She will incur future medical expenses, endure physical and mental pain and suffering and a loss of capacity to enjoy life.

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LOGAN COUNTY, WV


7. Defendant was put on notice of a claim when the Defendant's Superstore workers attended to Plaintiff after the fall, and the fall was witnessed by other customers of the Defendant.

WHEREFORE, Plaintiff's pray for judgment for the damages that the jury finds that she is entitled to be awarded, including but not limited to, compensatory damages, pain and suffering, post-accident terror, aggravation, annoyance & inconvenience, pre-judgment interest, post-judgment interest, court costs and any other legal relief that may be available.

PLAINTIFF DEMANDS A JURY TRIAL ON ALL ISSUES TRIABLE TO JURY.

PLAINTIFF,

By Counsel,



Steven S. Wolfe (W.Va. Bar #11914)
J. Christopher White (W.Va. Bar #9462)
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